

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification: VOICEPULSE INC.

Form 499 Filer ID: 826067

Name of signatory: Ravi Sakaria

Title of signatory: President, CEO

I, Ravi Sakaria, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: RAVI SAKARIA (electronic signature)

VoicePulse Company Procedures Relating to Protection of Customer Information

VoicePulse is a small company with nine (9) employees that provides interconnected Voice over Internet Protocol (“VoIP”) services. The Company has consistently protected its customers’ CPNI from unauthorized access, use and disclosure, in substantive compliance with the Commission’s Rules. Specifically, the Company has the following operational procedures that protects its customers’ CPNI:

- The Company does no marketing using CPNI and does not provide CPNI to any third party for marketing purposes.
- Only five (5) Company employees have access to customer billing records.
- The Company does not provide call detail information over the telephone. Customers that call the Company requesting CPNI or other call detail records (“CDR”) are directed to the Company’s website where customers must log in to their accounts in order to view their bills.
- The Company does not provide CDRs over the phone or by electronic mail.
- Internal access to CDRs is limited to billing, technical and management personnel that require access to such records as part of their duties. In order to access CDRs, authorized employees must enter a password.
- Company employees access customer billing records through an internal Customer Service application, which requires individual login/password authentication, and can only be accessed from computers physically in the VoicePulse offices.
- When customers initially signup for service, a randomly generated password composed of a series of alphanumeric characters is provided to the customer. Once the customer signs in, they can change it.
- The Company protects against data breaches using a firewall (the network and IT security infrastructure was designed by the CEO, who formerly held a CISSP certification).
- The Company has had no known breaches of CPNI protection, and has never received any complaints of breaches.
- The Company has not taken any actions against data brokers in the past year nor have any pretexters attempted to access the Company’s customers’ CPNI.
- The Company’s employee manual has a section devoted to protecting the confidentiality of customer information. Violations of this policy can result in disciplinary action.

As set forth above, VoicePulse has a history of protecting CPNI and takes this obligation seriously. Consistent with the intent and goals of the CPNI rules, the Company has and will continue to safeguard and protect its customers’ CPNI.